

STATEMENT OF BASIS (AI No. 11032)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0124109** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Air Logistics, LLC - A Bristow Company
Intracoastal City Base
4605 Industrial Drive
New Iberia, LA 70560

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: June 17, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permits –

LPDES permit effective date: N/A
LPDES permit expiration date: N/A

C. Date Application Received: January 8, 2008; Additional information was received via telephone on February 12, 2008, and via email on March 14, 2008. The facility submitted a Notice of Intent to Discharge Sanitary Wastewater. However, the facility does not qualify for the Class I Treated Sanitary Wastewater General Permit (LAG530000) because they discharge equipment washwater and stormwater. Therefore, an individual permit is being issued to cover their treated sanitary wastewater, exterior equipment washwater, and stormwater.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - heliport terminal and helicopter operating base**

This is an existing facility which serves as a heliport terminal and helicopter operating base. Aircraft are washed at the pads on a regular basis using low pressure and biodegradable soap. Routine, minor aircraft maintenance is performed out of doors on impervious surfaces on a regular basis. The aircraft are parked on impervious concrete hardstands when not in use. The facility discharges treated sanitary wastewater and external equipment washwater via local drainage to the Intracoastal Waterway.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4522

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C. LOCATION - 11760 Turtle Avenue, in Abbeville (Intracoastal City), Vermilion Parish
 (Latitude 29° 47' 16", Longitude 92° 09' 16")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
 Treatment: mechanical treatment plant
 Location: at the point of discharge from the STP located on the southeast part of the property, prior to mixing with waters of the state
 Flow: maximum capacity 2000 gpd
 Discharge Route: local drainage to pumping station, thence to the Intracoastal Waterway (060804)*

Outfall 002

Discharge Type: external equipment washwater
 Treatment: none
 Location: at the point of discharge from the pad, prior to mixing with waters of the state
 Flow: variable
 Discharge Route: local drainage to pumping station, thence to the Intracoastal Waterway (060804)*

* **Basin and Segment** - The facility is physically located in subsegment 060802 of the Vermilion-Teche Basin, defined at LAC 33:IX.1123. Table 3 as Vermilion River – From LA 3073 bridge to ICWW. However, the discharge does not flow into this defined waterbody, rather into subsegment 060804, defined at LAC 33:IX.1123. Table 3 as Intracoastal Waterway – from Vermilion Lock to one-half mile west of Gum Island Canal (Estuarine). Therefore, for purposes of issuing this permit, subsegment 060804 will be used in the development of requirements.

4. RECEIVING WATERS

STREAM - local drainage to pumping station, thence to the Intracoastal Waterway

BASIN AND SEGMENT – Vermilion – Teche Basin, Segment 060804

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 060804, Intracoastal Waterway, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060804 was previously listed as impaired for suspended solids/turbidity/siltation, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

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The following TMDL's have been established for subsegment 060804:

TMDL for TSS, Turbidity and Siltation for the 15 Subsegments in the Vermilion River Basin
 As per the EPA's TMDL *Siltation for the 15 Subsegments in the Vermilion River Basin*, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 5

No changes were made as this facility has not been previously permitted.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – There are no open, appealed, or pending OEC enforcement actions as of June 17, 2008.
 - 1. September 27, 2005 – incident report – According to the report, an incident was investigated with Mr. Jonathan Primm, environmental officer of the facility. They initially thought that they had lost the tank with the winds and water associated with Hurricane Rita. The crew working on that site reported today that the tank is in place and had not lost any of its contents. It was a sealed waste oil/jet fuel 1000 gallon capacity tank. It was covered by the tidal surge and was not swept away as initially reported. There was no evidence of spillage, no further action at this time. The incident was closed on October 6, 2005.
- B. Inspection - A field inspection performed at this facility on December 5, 2007 noted the following:
 - 1. Facility is a helicopter base that has an in-ground treatment unit for sanitary waste.
 - 2. Discharge is via local drainage to the ICCW
 - 3. No permit available.
- C. DMR Review/Excursions – N/A; this is an initial permit.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060804 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed

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soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Air Logistics, LLC - A Bristow Company

1. Outfall 001 - treated sanitary wastewater (maximum capacity is 2000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Weekly Average (mg/l)	<u>Reference</u>
Flow	--- : Report	similar discharges*, LAG530000 (BPJ)
BOD ₅	---: 45	similar discharges*, LAG530000 (BPJ)
TSS	---: 45	similar discharges*, LAG530000 (BPJ)
Fecal Coliform colonies/100 ml	---: 400 (Daily Max)	similar discharges*, LAG530000 (BPJ)
pH – Allowable Range (standard units)	6.0 – 9.0	similar discharges*, LAG530000 (BPJ)

Treatment: mechanical treatment plant

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the STP prior to mixing with waters of the state.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary General Permit, LAG530000, effective December 1, 2007.

2. Outfall 002 - external equipment washwater (estimated flow is variable)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report : Report	similar discharges*, LAG480000 (BPJ)
COD	200: 300	similar discharges*, LAG480000 (BPJ)
TSS	---: 45	similar discharges*, LAG480000 (BPJ)
Oil and Grease	---: 15	similar discharges*, LAG480000 (BPJ)
pH – Allowable Range (standard units)	6.0 – 9.0	similar discharges*, LAG480000 (BPJ)
Visible Sheen	---: No presence	similar discharges*, LAG480000 (BPJ)
Soaps/Detergents	Inventory Record: ---	similar discharges*, LAG480000 (BPJ)

Treatment: none

Monitoring Frequency: daily for visible sheen and quarterly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the pad prior to mixing with waters of the state. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

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Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000, effective August 1, 2001.

This facility performs washing of aircraft for aesthetics and to remove salt water. Therefore, 40 CFR 438 (Metal Products and Machinery Point Source Category) does not apply to this operation as per 438.1(c), which states "wastewater discharges resulting from the washing of cars, aircraft or other vehicles when performed only for aesthetic or cosmetic purposes are not subject to this part. Direct discharges resulting from the washing of cars, aircraft or other vehicles, when performed as a preparatory step prior to one or more successive manufacturing, rebuilding, or maintenance operations are subject to this part."

* Existing permits for similar outfalls

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4522 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility has equipment cleaning operations and performs routine aircraft maintenance.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).